



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE
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Ser BPM0/06
March 15, 2019

Ms. Meredith Williams
Acting Director
California Department of Toxic Substances Control
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Sacramento, CA 95812-4025

Ms. Karen L. Smith, MD, MPH
Director & State Public Health Officer
California Department of Public Health
PO Box 997377, MS 0500
Sacramento, CA 95899-7377

Mr. Enrique Manzanilla
Director, Superfund Program
US EPA Region 9
75 Hawthorne street
San Francisco, California 94105

Dear Ms. Williams, Ms. Smith, and Mr. Manzanilla:

The Navy has been working with your agencies over the past year on the resampling plan for radiological work at the former Hunters Point Naval Shipyard (HPNS). Thank you for your input, patience, and attendance at numerous meetings to identify how the resampling should be conducted. We extended the Federal Facility Agreement (FFA) schedule to finalize the Draft Final Work Plan (Work Plan) of November 2018 in order to provide more time for additional discussion and comment resolution.

My understanding is that the agencies wish to engage in further discussion on the Work Plan concerning the intended reuse of the buildings, as well as equipment sensitivity used in evaluating the buildings. Consensus regarding buildings will be addressed by the FFA parties in the future. However, to initiate field work the Navy will proceed with finalizing the Work Plan using the release criteria established by the current Record of Decision (ROD).

Also, as a distinctly separate process and independent of the Parcel G Work Plan, the Navy will complete the Five-Year Review Report identifying short term protectiveness of the existing radiological sites. The Five Year Review process will also include evaluation of the remedy effectiveness once the Work Plan is implemented, and data are collected.

There have been many discussions between the EPA and the Navy about the use of the PRG Calculator. This is one of many tools for evaluating the risk from exposure to radionuclides. As

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the lead agency, the Navy has determined the RESRAD family of codes contain the most scientifically sound exposure models of the available tools and, as such, will be using these codes for determining the residual risk from radionuclides.

The Navy is focused on collection of high quality data that are technically defensible and supported by the regulatory agencies and the public. The Navy will remain transparent throughout the process with a top priority to restore public confidence in the radiological rework and the continued environmental cleanup at HPNS.

Sincerely,


LAURA DUCHNAK